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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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Telephone Number Portability)
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CC Docket No. 95-116
DA 98-451

COMMENTS OF AT&T CORP.

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March 12, 1998

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SUMMARY

As the Commission has recognized, the failure of the former LNP Administrator in the Western, Southeast and West Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS") will prevent carriers in those regions from deploying Phase I of permanent local number portability ("PLNP") in compliance with the schedule established in the LNP Reconsideration Order. There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay.

The petitioners agree that Lockheed Martin IMS, the new LNPA for the affected regions, has committed to deliver an NPAC/SMS by May 11, 1998, and that implementation of PLNP Phase I can begin after approximately 30 days of intercompany testing. The parties' central dispute concerns the amount of time required to deploy PLNP following testing. As AT&T demonstrates, two weeks following inter-company testing should be ample time for carriers to complete Phase I.

The ILEC petitioners seek to justify unreasonably long periods for PLNP implementation by making wholly inapposite comparisons to the intervals established by the LNP Reconsideration Order. While that order addressed the full range of issues involved in carriers' implementation of PLNP and established a schedule accordingly, the Commission has ordered carriers to complete the vast majority of network modifications necessary for PLNP Phase I no later than March 31, 1998. Thus, the only aspects of LNP that will not be in place by the new NPAC/SMS "live" date are those that directly relate to carriers' ability to place "orders" for porting with the NPAC/SMS, and to download routing information

from that system to local SMSs. In light of the fact that the Commission's Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, the ILEC petitioners have long known the specifications to which they had to build in order to interface with the NPAC/SMS for these functions. In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. The record before the Commission strongly supports establishment of the following PLNP implementation deadlines for all carriers in the Western, Southeastern and West Coast regions:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

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COMMENTS OF AT&T CORP.

Pursuant to Sections 1.3 and 52.3(d) of the Commission's Rules, 47 C.F.R. §§ 1.3, 52.3(d), and the Public Notice released March 5, 1998, AT&T Corp. ("AT&T") hereby comments on the petitions for waiver of the Permanent Local Number Portability ("PLNP") Phase I implementation deadline of March 31, 1998 filed by GTE Service Corporation ("GTE"), MediaOne, Inc. ("MediaOne"), Pacific Bell ("Pacific"), and U S West Communications, Inc. ("U S West").

AT&T is fully committed to fulfilling the Commission's LNP requirements, and has made every effort to ensure that number portability implementation -- both in its own network and throughout the industry -- complies with the schedule established by the Commission's rules. However, as the Commission recognized in the Phase I Waiver Order,¹ the failure of the former LNP Administrator ("LNPA") in the Western, Southeast and West

¹ Order, Telephone Number Portability, CC Docket No. 95-116, DA 98-152, released January 28, 1998 ("Phase I Waiver Order").

Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS")² will prevent carriers in those regions from offering long-term portability in compliance with the schedule established in the LNP Reconsideration Order.³ There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay. Accordingly, AT&T will confine these comments to that issue.⁴

² The NPAC/SMS is

a hardware and software platform that will contain the database of information required to effect the porting of telephone numbers. In general, the Number Portability Administration Center Service Management System will receive customer information from both the old and new service providers, validate the information received, and download the new routing information when an "activate" message is received indicating that the customer has been physically connected to the new service provider's network.

Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 9, n.28 ("LNP Second Report and Order").

³ First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, CC Docket No. 95-116, FCC 97-74, released March 11, 1997 ("LNP Reconsideration Order").

⁴ The five petitions addressed in the Public Notice are only a portion of the Phase I waiver requests lodged with the Commission. Eight additional waivers were the subject of a Public Notice (DA 98-449) issued on March 4, 1998, which requested comments on the same schedule as the instant Notice. In order to ensure a complete record for the Commission's consideration of a new LNP implementation schedule in the affected regions, AT&T hereby incorporates its comments on the March 4th Public Notice into the instant pleading by reference.

I. AS THE COMMISSION HAS FOUND, PLNP IS "ESSENTIAL" TO LOCAL EXCHANGE COMPETITION

As a preliminary matter, it is important to note that with the exception of AT&T's pleading, all of the petitions addressed in the Public Notice were filed by incumbent LECs or their affiliates. The ILECs' claims should be carefully scrutinized, as any delay in PLNP implementation would be costless, if not beneficial, to those carriers, but will seriously impact their competitors. AT&T does not contend that the unavailability of the NPAC/SMS is attributable to any fault on the part of the ILEC petitioners.⁵ It is clear, however, that those carriers potentially can gain significant advantages by delaying the implementation of PLNP for as long as possible.

Congress recognized the importance of LNP to local competition by expressly requiring all LECs to provide that capability in § 251(b)(2), and by also including "full compliance" with the Commission's LNP rules as a component of the § 271 "checklist."⁶ Any delay in the implementation of PLNP potentially will injure nascent local

⁵ It is unclear, however, whether Pacific's inability to provide PLNP is in fact attributable to the unavailability of the NPAC/SMS, or to problems arising in its own network. As AT&T stated in its comments on Pacific's recent joint filing with Southwestern Bell Telephone Company, Pacific appears to have represented to the Commission both that it would be prepared to provide PLNP on time if a West Coast region NPAC/SMS were ready, and that it could not do so. See Comments of AT&T Corp., filed March 9, 1998, pp. 4-5, in SBC Companies Petition for Waiver Of Under 47 C.F.R. § 52.3(d) And Petition For Extension Of Time Of The Local Number Portability Phase I Implementation Deadline, CC Docket No. 95-116, NSD File No. L-98-16. In the event Pacific's inability to provide PLNP is not solely caused by the unavailability of an NPAC/SMS, then it should not be permitted to profit from any change to the Commission's PLNP schedule. See id., pp. 15-16.

⁶ See 47 U.S.C. § 271(c)(2)(B)(xi).

exchange competition. First, the Commission recognized in its First LNP Order that interim methods of local number portability ("ILNP") can impair "the quality, reliability, or convenience of telecommunications services" offered by new entrants into local exchange markets.⁷ Accordingly, that order found that "[permanent] number portability is essential to ensure meaningful competition in the provision of local exchange services."⁸

Second, CLECs in the affected regions already have incurred the expense of implementing PLNP in their own networks, and will soon begin to bear their share of the NPAC/SMS costs as well. Nevertheless, although CLECs will be paying for PLNP, until ILECs begin to support that capability their competitors will have no choice but to port numbers using ILNP -- and thus they will, in effect, be required to pay for both interim and permanent portability for each customer that ports a number. Third, when ILECs do begin to support PLNP, CLECs will bear the costs of converting customers from interim to permanent portability -- an expense they would not have borne for customers acquired after the Commission's PLNP implementation deadline, but for the delay of that capability.

In contrast to CLECs, ILECs potentially benefit by delaying PLNP. Most importantly, their CLEC competitors will be handicapped in the quality of service they can offer to customers porting their numbers using ILNP methods. In addition, ILECs will obtain additional payments from CLECs for ILNP services provided to existing CLEC

⁷ Telephone Number Portability, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, released July 2, 1996, ¶ 110 ("First LNP Order").

⁸ Id., ¶ 28.

customers after the date on which PLNP should have been available, payments for ILNP services provided to new CLEC customers that port their numbers after the original PLNP implementation date, and payments to convert such new CLEC customers from ILNP to PLNP.

II. AN NPAC/SMS WILL BE AVAILABLE FOR INTERCOMPANY TESTING IN EACH OF THE AFFECTED REGIONS ON MAY 11, 1998

The LLCs of all three affected regions recently replaced Perot Systems with Lockheed Martin IMS as LNPA. As the Commission knows, Lockheed was selected as LNPA for the four other LNP regions, and that company has developed and implemented a workable NPAC/SMS in those areas. Lockheed has committed to deliver an NPAC/SMS for the Western, Southeast and West Coast regions that is ready for intercompany testing on May 11, 1998.⁹ The petitioners do not dispute that May 11th is planned as the NPAC/SMS “live” date, and their proposed schedules all are based on this starting point, as intercompany testing cannot proceed until this milestone is achieved.

III. THE COMMISSION SHOULD ADOPT AT&T’S PROPOSED PLNP IMPLEMENTATION SCHEDULE FOR PHASE I MSAs

Although all four of the parties that offer a proposed implementation schedule begin from the same May 11, 1998 NPAC/SMS “live” date, they do not agree on a date by which Phase I PLNP deployment should be completed.¹⁰ Two dates are most relevant to the Commission’s consideration of a new Phase I LNP schedule: (i) the date by

⁹ See AT&T Corp. Petition for Waiver, filed March 2, 1998, p. 5 in Telephone Number Portability, CC Docket No. 95-116.

¹⁰ MediaOne does not propose a revised schedule for LNP implementation.

which any necessary intercompany testing will be completed, and (ii) the date implementation will be completed. The positions of the parties are as follows:

Carrier	End Testing	End Phase I
AT&T	6/11/98	6/26/98
GTE	6/14/98	8/13/98
Pacific Bell	6/11/98	7/20/98
U S West	no date specified	7/17/98

Testing. All of the petitioners propose that testing will last approximately 30 days, and all save U S West agree that testing can commence on the day after Lockheed's delivery of an NPAC/SMS.¹¹ U S West, however, proposes to begin testing on May 18th, one week after the NPAC/SMS "live" date, on the grounds that "[t]he week between May 11, 1998 and May 18, 1998 is reserved for returning the NPAC/SMS to a live network-ready status (versus a test status)."¹² There is simply no basis for such a delay, as the other petitions make clear. Lockheed has committed to deliver an NPAC/SMS that is, in U S West's phrasing, "network ready." There is simply no basis for the assertion that any carrier requires an additional week to prepare that system for testing. Accordingly, the Commission should order carriers to commence testing on May 12, 1998 (or the day following the NPAC/SMS "live" date in the relevant region, in the event there is some delay

¹¹ See AT&T, p. 5; GTE, p. 9 (table proposing to begin testing on 5/12/98 and complete it on 6/14/98, a total of 32 days); Pacific, pp. 19, 20 (proposing a "30 day cooperative testing period"); U S West Attachment 1, p. 5 (chart showing 30-day testing intervals).

¹² U S West Attachment 1, p. 5.

in Lockheed's performance), and to complete that testing on June 11, 1998 (or 30 days after testing commences).

U S West proposes to perform its testing in serial fashion in each of its three internal "regions," vestiges of the predecessor Bell companies that combined to form that carrier fourteen years ago. U S West claims that it cannot perform testing in a more efficient, parallel fashion due to the continued existence of three distinct sets of systems and a shortage of employees with the requisite specialized skills.¹³ U S West's position is inherently contradictory, however. If U S West in fact possesses three distinct sets of systems in three separate regions, then that company must have separate personnel and other resources devoted to each region's operations, each expert on the systems within their region. These region-specific resources presumably could be combined with testing-specific resources to perform simultaneous testing. U S West's petition does not explore this or other alternatives to serial testing.

Phase I End Date. The commenters agree that PLNP implementation can begin the day following the completion of testing.¹⁴ They do not agree, however, on when that process should be completed. The ILECs propose to permit as much as two months (GTE's estimate) from the close of testing to full deployment of PLNP. These figures are

¹³ Id., pp. 4-5.

¹⁴ See AT&T, pp. 5-6; GTE, p. 9 (chart depicting testing ending 6/14/98, and implementation beginning 6/15/98); Pacific, p. 20 ("Pacific will begin to accept and process orders for live porting transactions in the Los Angeles MSA approximately 1 work day after the conclusion of intercompany testing."). U S West does not state precisely when it proposes to begin implementation, stating only that testing will last 30 days, and giving an end date for implementation.

plainly inflated, and should be rejected. Two weeks following inter-company testing should be ample time for carriers to implement Phase I LNP.

The two-week interval AT&T proposes is more than adequate to permit carriers to do any last-minute clean-ups to their own systems and processes, and to prepare themselves to accept orders for PLNP. This is especially so when one considers that "implementation" of PLNP means nothing more than being prepared to accept and fulfill orders for that service. Carriers have agreed that conversion of customers from ILNP to PLNP will be conducted on a separate timetable. Conversion should occur within 90 days following the availability of both PLNP and an operational interface to permit CLECs to order conversions from interim portability methods to PLNP.

The ILECs' petitions seek to justify their unreasonably long periods for PLNP implementation by comparing them to the intervals in which the LNP Reconsideration Order allowed carriers to phase-in PLNP.¹⁵ This comparison is simply

¹⁵ Indeed, GTE's petition actually proposes longer intervals for PLNP implementation than it proposed in its reports to the California LNP Task Force. In those reports, GTE stated that its implementation intervals for Phases I through III would be as follows:

Phase I: 2/16/98-3/30/98 (43 days)
Phase II: 4/9/98-5/15/98 (36 days)
Phase III: beginning and ending on 6/30/98 (1 day)

In contrast, GTE's petition proposes the following intervals:

Phase I: 6/15/98-8/13/98 (59 days)
Phase II: not less than 50 days after Phase I
Phase III: not less than 30 days after Phase II

(footnote continued on next page)

inapposite. According to the express terms of the Phase I Waiver Order, carriers in the Western, Southeast, and West Coast regions should not have delayed their implementation of LNP in any respect other than those that “specifically relate to the availability of the vendor-supplied [NPAC/SMS].”¹⁶ The LNP Reconsideration Order addressed the full range of issues involved in carriers’ implementation of PLNP, and established a schedule accordingly. In stark contrast, as the Phase I Waiver Order makes plain, the vast majority of network modifications required to implement PLNP must be completed for Phase I MSAs no later than March 31, 1998 -- more than a month before the NPAC/SMS “live” date in the affected regions.¹⁷

Thus, the only aspects of LNP that have yet to be finalized are those that directly relate to carriers' ability to place “orders” for porting with the NPAC/SMS, and to download routing information from that system to local SMSs. In light of the fact that the Commission’s Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, the ILEC petitioners have long known the specifications to which they had to build in order to interface with the NPAC/SMS for these

(footnote continued from previous page)

See GTE, Reports to the California LNP Task Force, 11/20/97 and 1/13/98, attached as Exhibit 1.

¹⁶ Phase I Waiver Order, ¶ 8.

¹⁷ See Id.

functions.¹⁸ In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

In addition, by AT&T's proposed June 26th deadline, the industry will already have gained valuable experience and knowledge from implementing Phases I and II in the other four LNP regions, as the LNP Reconsideration Order requires LNP implementation in Phase II MSAs no later than May 15, 1998. Even those carriers that do not participate in Phases I and II of LNP implementation in other regions will benefit from the experiences vendors (many of which work for more than one carrier), regulators, and other carriers will gain in working with the Lockheed NPAC/SMS, and significant knowledge transfers can be expected through industry fora such as the LLCs, as well as through informal contacts.

The Commission should mandate completion of PLNP implementation in Phase I MSAs in the Western, Southeast and West Coast regions by June 26, 1998 -- or two weeks following the completion of intercompany testing in the event Lockheed is unable to meet the current May 11, 1998 NPAC/SMS "live" date.

¹⁸ See Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 62 ("Second LNP Order") ("We adopt the NANC's recommendation that the local number portability administrators and any entity directly connecting to the Number Portability Administration Center Service Management System use the Number Portability Administration Center Service Management System Interoperable Interface Specification.... The NANC IIS will serve as an industry standard for use in developing and maintaining the Number Portability Administration Center Service Management System interfaces in each of the seven Number Portability Administration Center regions.") (emphasis added).

IV. THE COMMISSION SHOULD USE THE INSTANT PROCEEDING TO
COMPLETE ITS ADJUSTMENT OF THE LNP TIMETABLE IN THE
AFFECTED REGIONS

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. It would be an inefficient use of the already heavily taxed resources of both the Commission's staff and carriers to conduct repeated rounds of comments on subsequent LNP Phases that inevitably would present precisely the same issues as the instant petitions. Once the Phase I schedule is adjusted, establishing a timetable for the remaining Phases is a straightforward matter.

After intercompany testing of the Lockheed NPAC/SMS is completed for Phase I MSAs in each region, there is no valid reason for that testing to be repeated in subsequent MSAs. Further, as the Phase I Waiver Order required for Phase I MSAs, carriers in the Western, Southeast, and West Coast regions should be continuing their efforts to complete all necessary modifications and upgrades in their own networks to prepare themselves to offer PLNP in subsequent Phases according to the schedule established in the LNP Reconsideration Order. Thus, after completion of Phase I, carriers approaching Phase II should need no more than two weeks to complete implementation in those MSAs -- just as they required two weeks following the completion of testing to complete Phase I. Similarly, Phase III can, and should, be completed two weeks after completion of Phase II. If the Commission adopts AT&T's proposal, it can return to the LNP Reconsideration Order's schedule beginning in Phase IV.

CONCLUSION

For the reasons stated above, the Commission should establish the following deadlines for Permanent Local Number Portability implementation in the Western, Southeastern and West Coast regions by all carriers:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

Respectfully submitted,

By

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March 12, 1998

AT&T Corp.

12

3/12/98

EXHIBIT 1

REPORT TO THE CALIFORNIA LNP TASK FORCE
GTE LNP DEPLOYMENT - PHASE 1
 Updated 11/20/97

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase 1, Los Angeles (MSA-1), beginning February 16, 1998 and completing March 31, 1998.

GTE Switch Clusters And Component Sites
By Proposed Deployment Ranking

CLUSTER NAME / GTE RANKING	SITE NAMES	SWITCH TYPE	ACO	CLLI CODE
SANTA MONICA / WEST L.A. CLUSTER Ranking: 1 Date: 2/16/98	BEL AIR	GTD-5	706	BEIRCAXF47K
	BUNDY - SM	SESS	717	WLANCAXHDS1
	BUNDY - WLA	GTD-5	719	WLANCAXH2J
	MALIBU	GTD-5	746	MALBCAXG45A
	MAR VISTA	GTD-5	748	CLCYCAXQ39K
	MARDNA DEL REY	SESS	793	PDRYCAXF82A
	PACIFIC PALISADES	GTD-5	762	PCPLCAXF45K
	SANTA MONICA	SESS	778	SNMNCAXGDS0
	SUNSET	DMS-100	727	SNMNCAXJ1K
	UNIVERSITY	DMS-100	789	WLANCAXJDS0
	WEST LOS ANGELES	SESS	717	WLANCAXFDS1
	WESTWOOD	GTD-5	792	WLANCAXG47G
	ZUMA	GTD-5	798	MALBCAXF45K
COVINA CLUSTER Ranking: 2 Date: 2/23/98	AZUSA	DMS-100	411	AZUBCAXF33K
	BALDWIN PARK	DMS-100	412	BLPKCAXF33K
	COVINA	GTD-5	421	COVNCAXF33M
	GLENDORA	GTD-5	422	GLNDCAXF33M
	LA PUENTE	SESS	431	LAPNCAXGDS1
	MAPLEGROVE	SESS	433	LAPNCAXLDS0
	MONROVIA	GTD-5	441	MNRVCAXG35K
	ROWLAND	SESS	432	LAPNCAXFDS1
	ROWLAND	GTD-5	432	LAPNCAXF91K
	SIERRA MADRE	GTD-5	442	SRMDCAXF35K

ALL DATES AND DEPLOYMENT RANKINGS AS SHOWN IN THIS REPORT ARE PROPOSED. THEY ARE PROVIDED BY GTE TO THE TASK FORCE FOR PRELIMINARY PURPOSES ONLY AND ARE SUBJECT TO CHANGE. THE DATES INDICATE WHEN GTE WILL ACCEPT SERVICE ORDERS.

DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

GTE LNP DEPLOYMENT - PHASE I
Updated 11/20/97

(continued from previous page)

CLUSTER NAME / GTE RANKING	SITE NAMES	SWITCH TYPE	ACO	CLLI CODE
LONG BEACH CLUSTER Ranking: 3 Date: 2/13/98	ALAMITOS CLARK LONG BEACH MAIN M. L. KING MARKET STADIUM TERMINO UPTOWN	GTD-5 GTD-5 SESS DMS-100 GTD-5 IAESS SESS SESS	801 885 843 825 845 836 884 855	SLBHCAXF43J LNBHCAXMD60 LNBHCAXFD60 LNBHCAXLD60 LNBHCAXH42P LNBHCAXS42E LNBHCAXT43K LNBHCAXGD60
POMONA CLUSTER Ranking: 4 Date: 3/02/98	CLAREMONT DIAMOND BAR LA VERNE POMONA SAN DIMAS WALNUT	GTD-5 GTD-5 GTD-5 GTD-5 GTD-5 SESS	556 588 557 558 559 560	CLMTCAXF62G DMBRCAXF66M LVRNCAXF59H POMNCAXF62E SNDMCAXF59C WLNTCAXFDS0
LANCASTER CLUSTER Ranking: 5 Date: 3/02/98	ANTELOPE LANCASTER QUARTZ HILL	SESS GTD-5 GTD-5	765 769 766	LNCSCAXFD60 LNCSCAXG94K QZHLCAXF94K
BELLFLOWER CLUSTER Ranking: 6 Date: 3/09/98	ALONDRA ARTESIA BELLFLOWER DOWNEY FLORENCE IMPERIAL NORWALK	SESS DMS-100 GTD-5 GTD-5 GTD-5 GTD-5 GTD-5	858 803 809 820 819 821 857	NRWLCAXGDS0 ARTSCAXF66S BLFLCAXF66K DWNVCAXF66K BLORCAXF92K DWNVCAXG80G NRWLCAXF92S
REDONDO CLUSTER Ranking: 7 Date: 3/16/98	DEL AMO EL NIDO MANHATTAN BEACH PALOS VERDES REDONDO ROLLING HILLS	GTD-5 GTD-5 DMS-100 GTD-5 GTD-5 GTD-5	876 871 873 872 874 875	TRNCCAXF54K RDBHCAXF37K MNBHCAXF54K TRNCCAXG97J HRBHCAXA37K RLHLCAXF79L

GTE LNP DEPLOYMENT - PHASE I

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DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

Updated 11/20/97

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CLUSTER NAME / GTE RANKING	SITE NAMES	SWITCH TYPE	ACO	CLLI CODE
SAN FERNANDO CLUSTER Ranking: 8 Date: 3/23/98	GRANADA HILLS	GTD-5	704	GRHLCAXF36J
	PACOMA	GTD-5	733	PACMCAXF89K
	SAN FERNANDO	GTD-5	732	SNFNCAXG36K
	SEPULVEDA	SESS	703	SPLVCAXFDS1
	SEPULVEDA	GTD-5	703	SPLVCAXF89K
	SUNLAND/TUJUNGA	GTD-5	735	SNLDCAXF55K
	SYLMAR	GTD-5	734	SYLMCAXF86K
WHITTIER CLUSTER Ranking: 9 Date: 3/30/98	LA HABRA	SESS	861	LAHBCAXFDS0
	PICO	GTD-5	863	WHTRCAXJ69L
	RIO HONDO	SESS	862	PCRVCAJFDS0
	VALLEY VIEW	GTD-5	864	WHTRCAXJ84K
	WHITTIER SOUTH	GTD-5	865	WHTRCAXF69M
	WHITWOOD	GTD-5	866	WHTRCAXG84C

ALL DATES AND DEPLOYMENT RANKINGS AS SHOWN IN THIS REPORT ARE PROPOSED. THEY ARE PROVIDED BY GTE TO THE TASK FORCE FOR PRELIMINARY PURPOSES ONLY AND ARE SUBJECT TO CHANGE. THE DATES INDICATE WHEN GTE WILL ACCEPT SERVICE ORDERS.

DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

REPORT TO THE CALIFORNIA LNP TASK FORCE



LNP DEPLOYMENT - PHASE 2

Updated 1/13/98

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase 2, Riverside / San Bernardino County (MSA-10), beginning April 1, 1998 and completing May 15, 1998.

GTE Switch Clusters And Component Sites By Proposed Deployment Ranking

CLUSTER NAME / GTE RANKING	SITE NAMES	SWITCH TYPE	CLLI CODE
ONTARIO CLUSTER Ranking: 1 Proposed Port Date: 4/9/98	CHINO CUCAMONGA CUCAMONGA ETIWANDA LOS SERRANOS ONTARIO AIRPORT ONTARIO MAIN ONTARIO SOUTH UPLAND	GTD-5 BU GTD-5 BU SBS BU GTD-5 BU GTD-5 BU DMS100 BU DMS100 BU GTD-5 BU GTD-5 BU	CHNOCAXP62J CCMNCAXP98K CCMNCAXPDS1 ETWNCAXP89L LSBRCAXP59J ONTRCAXP8080 ONTRCAXP98K ONTRCAXP94L UPLDCAXP98G
BANNING CLUSTER Ranking: 2 Proposed Port Date: 4/16/98	BANNING BEAUBONT CALIMESA MENTONE YUCAIPA	GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU DMS100 BU	BNNGCAXP84L BUMTCAXP84L CLMSCAXP79G MENTCAXP79X YUCPCAXP79M
ELSINORE CLUSTER Ranking: 3 Proposed Port Date: 4/23/98	EDGEMONT ELSINORE GRAND ELSINORE MAIN HEMET HOMELAND MURRIETA PERRIS QUAIL VALLEY RANCHO CALIF SAN JACINTO SUN CITY SUNNYMEAD VALLE VISTA	GTD-5 BU DMS100 BU GTD-5 BU GTD-5 BU DMS100 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU	EDMTCAXP65H ELSNCAXP67K ELSNCAXP67N HEMTCAXP65C HMLDCAXP92H MURTCAXP67J PERSCAXP65X QUVYCAXP24K RNCACAXP67X SNJCCAXG65F SNCYCAXP67K SNVYCAXP92F VLVSCAXP92X

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DESIGNATION OF A SWITCH WITHIN A CLUSTER DOES NOT GUARANTEE DEPLOYMENT OF THAT SWITCH AT THE SAME TIME AS OTHER SWITCHES WITHIN THE CLUSTER.

GTE LNP DEPLOYMENT - PHASE 2
Updated 1/13/98

(continued from previous page)

CLUSTER NAME/ GTE RANKING	SITE NAMES	SWITCH TYPE	CLI CODES
PALM SPRINGS CLUSTER Ranking: 4 Proposed Port Date: 5/1/98	COACHELLA DESERT HOT SPGS INDEO LA QUINTA PALM DESERT PALMS SPRINGS PALM SPGS EAST RANCHO MERAGE THOUSAND PALMS TWENTYNINE PALMS WASHINGTON ST. YUCCA VALLEY	GTD-3 BU GTD-5 BU SESS BU GTD-5 BU GTD-5 BU SESS BU GTD-5 BU SESS BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU	CCHLCAXP39L DHSPCAXP66X INDICAXGDS0 LAQNCAXG56L PLDSCAXF34A PLSPCAXGDS0 PLSPCAXG32G RNMGCAXGDS0 THPLCAXGDS0 TWPLCAXF36K BRDNCAXF34G YCVYCAAXG36X
SAN BERNARDINO CLUSTER Ranking: 5 Proposed Port Date: 5/8/98	ARROWHEAD CRESTLINE LOMA LINDA MARSHALL MUSCOY NORTON AFB REDLANDS SAN BERNARDINO WATERMAN	GTD-3 BU GTD-5 BU GTD-5 BU GTD-5 BU GTD-5 BU DMS-100 BU DMS-100 BU GTD-3 BU SESS BU	ARNDCAXF33H CRLNCAXF33X LMLNCAXF79L SNBRCAXG88K MSCYCAXF88K SNBRCAXND50 RDLDCAXF79K SNBRCAXX88E SNBRCAJLD50
VICTORVILLE/ BLYTHE CLUSTER Ranking: 6 Proposed Port Date: 5/15/98	ADELANTO APPLE VALLEY BARSTOW BIG BEAR LAKE BLYTHE EARP HAVASU LANDING HESPERIA LOST LAKE RIDGECREST VICTORVILLE	DMS100-BU DMS100-BU SESS-BU SESS-BU DMS100/2-AT DMS-RSLE DMS-RSLE DMS-RSLE DMS100-BU DMS-RSLE SESS-BU DMS100-BU	ADLNCAXFDS0 APVYCAXF2AJ BRSWCAXHD50 BBLKCAXFDS0 BLYTCAXF92K EARPCAXC665 HV3UCAXFRS1 HSPRCAXFDS0 LSLKCAXC664 RDGCAXGDS0 VTVLCAAXD50

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REPORT TO THE CALIFORNIA LNP TASK FORCE



LNP DEPLOYMENT - PHASE 3

Updated 1/13/98

GTE PROPOSED LNP DEPLOYMENT WINDOW

Proposed LNP Deployment for Phase 3, Orange County (MSA-15) & San Francisco County (MSA-29), beginning and completing on June 30, 1998.

GTE Switch Clusters And Component Sites By Proposed Deployment Ranking

CLUSTER NAME / GTE RANKING	SITE NAME	SWITCH TYPE	CLL CODE
ORANGE / SAN FRANCISCO CLUSTER	BUSHARD	GYDS	HNBHCAXG96A
	HUNTINGTON BCH	GTD-S	HNBHCAXG96L
	LAGUNA BEACH	GTD-S	LGBHCAXF49K
	SLATER	GTD-S	HNBHCAXF84C
	WARNER	DMS-100	HNBHCAXL84S
	WESTMINSTER	SESS BU	WMNSCAXFD50
Proposed Port Date: 6/30/98	NOVATO	GTD-S	NOVTCAXFD80

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GTE PROPOSED LNP DEPLOYMENT WINDOW - PHASE 3

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CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 12th day of March, 1998, a copy of the foregoing "Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.



Terri Yannotta

March 12, 1998

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